

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

MICHAEL GORCHOCK,

Plaintiff,

v.

FIRSTENERGY CORP., *et al.*,

Defendants; Third-Party Plaintiffs,

v.

ENERFAB, INC.,

Third-Party Defendant.

Civil Action No. 2:17-cv-01494-DSC

Consolidated for discovery purposes with:
19-1323, 19-1324, 19-1325, 19-1329, 17-1496,
17-1497, 17-1499.

MOTION FOR PROTECTIVE ORDER

For the reasons set forth in FirstEnergy Corp.'s Brief in Opposition to Plaintiffs' Motion to Compel the Deposition of Steven R. Staub and In Support of Its Motion for Protective Order ("Brief"), Plaintiff should not be permitted to depose Mr. Staub. If such deposition is permitted, and for the reasons set forth in its Brief (at 12), FirstEnergy Corp. hereby moves for a Protective Order: (1) limiting the deposition to two hours; and (2) limiting the deposition to relevant topics.

WHEREFORE, FirstEnergy Corp. respectfully requests that his Honorable Court enter a Protective Order limiting the duration and topics for Mr. Staub's deposition. A proposed Order is attached.

Respectfully submitted,

/s/ Benjamin T. Verney

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*Counsel for Defendant/Third-Party Plaintiff,
FirstEnergy Corp.*

CERTIFICATE OF CONFERRAL

I hereby certify that FirstEnergy Corp. conferred in good faith in accordance with Fed. R. Civ. P. 26(c)(1) in an effort to resolve the aforementioned dispute without Court action. *See* Brief at Ex. 3.

/s/ Benjamin T. Verney
Counsel for FirstEnergy Corp.

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of March, 2022 a true and correct copy of the foregoing was served on counsel of record via ECF.

/s/ Benjamin T. Verney
Counsel for FirstEnergy Corp.